

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 17-32 J
)	
WILLIAM R. DUNBAR)	

INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Soo C. Song, Acting United States Attorney for the Western District of Pennsylvania, and Stephanie L. Haines, Assistant United States Attorney for said district, and submits the following Information Memorandum to the Court:

I. THE INFORMATION

The United States Attorney filed a one-count Information against the above-named defendant for an alleged violation of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
1	Threat Against the Vice President of the United States	18 U.S.C. § 871

II. ELEMENTS OF THE OFFENSE

A. As to Count One:

In order for the crime of making a threat against the Vice President of the United States, in violation of Title 18, United States Code, Sections 871, to be established, the government must prove all of the following essential elements, beyond a reasonable doubt:

1. That on or about the date set forth in the Information, the defendant knowingly and willfully made a threat; and,
2. That such threat was made against the Vice President of the United States.

III. PENALTIES

A. As to Count One: Threat Against the Vice President of the United States, 18 U.S.C. § 871:

1. A term of imprisonment of not more than five (5) years.
2. A fine of not more than \$250,000.
3. A term of supervised release of not more than three (3) years.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$100 must be imposed, pursuant to 18 U.S.C. § 3013, as the offense occurred on or after April 24, 1996.

V. RESTITUTION

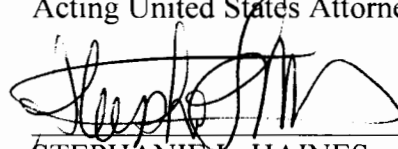
Not applicable in this case.

VI. FORFEITURE

Not applicable in this case.

Respectfully submitted,

SOO C. SONG
Acting United States Attorney



STEPHANIE L. HAINES
Assistant U.S. Attorney
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